

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: _____ DATE FILED: 3/1/2022
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February 28, 2022

VIA ECF

Hon. Sarah Netburn
 United States District Court for the Southern District of New York
 40 Foley Square, Room 430
 New York, NY 10007

Re: Global Gaming Philippines, LLC v. Razon, Jr., et al., 21 Cv. 2655 (LGS) (SN)

Dear Magistrate Judge Netburn:

Further to the Court's orders entered on January 19, 2022 (Dkt. No. 209) and February 18, 2022 (Dkt No. 213), the parties hereby submit this joint letter to provide the Court the deposition schedule to which they have agreed.

Deponent Name	Noticing Party	Date	Location
Gerard "Bing" Festin	Plaintiff	Friday, April 1, 2022 (Manila time)	Remote
Arnold Rivas	Plaintiff	Tuesday, April 5, 2022 (Manila time)	Remote
Christopher Espera	Plaintiff	Friday, April 8, 2022 (Manila time)	Remote
Donato Almeda (individually and as a 30(b)(6) witness for BRHI and SPI)	Plaintiff	To be scheduled for a to-be-determined date during the week starting April 11 or April 18, 2022 (Manila time), or such other date after April 8, 2022 agreed to by the parties	Remote
William P. Weidner	Defendants	Wednesday, April 20, 2022	Las Vegas, NV
Garry W. Saunders	Defendants	Friday, April 22, 2022	Las Vegas, NV
Silverio "Benny" Tan	Plaintiff	Tuesday, April 26, 2022 (Manila time)	Remote
Bradley H. Stone	Defendants	Wednesday, April 27, 2022	Las Vegas, NV

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Deponent Name	Noticing Party	Date	Location
Jose Alarilla	Plaintiff	Friday, April 29, 2022 (Manila time)	Remote
Estella Tuason-Occena (individually and as a 30(b)(6) witness for BRHI and SPI and the Energy Entities)	Plaintiff	Wednesday-Thursday, May 4-5, 2022 (Manila time)	Remote
Medel Payumo (individually and as a 30(b)(6) witness for the Real Estate Entities)	Plaintiff	Friday, May 6, 2022	New York, NY
Enrique K. Razon, Jr. (individually and as a 30(b)(6) witness for BRHI, SPI, and the Real Estate Entities)	Plaintiff	Wednesday-Thursday, May 11-12, 2022* *Subject to a to-be- agreed time limit of less than 7 hours per day	New York, NY
Jonathan Rein	Defendants	Tuesday, May 17, 2022	New York, NY
Binyomin Kaplan (as a 30(b)(6) witness for Plaintiff)	Defendants	Thursday, May 19, 2022	New York, NY
Binyomin Kaplan (as a 30(b)(6) witness for Cantor Fitzgerald L.P.)	Defendants	Friday, May 20, 2022	New York, NY

Both sides have expressed interest in taking additional depositions, but the Parties have agreed to proceed with the depositions of the party witnesses above and that any further depositions will require express agreement of the Parties or a court order. More specifically:

1. Defendants have objected to Plaintiff taking more than the depositions above because Plaintiff would exceed the presumptive limit of 10 depositions provided by Rule 30(a)(2). Plaintiff believes that the facts of this case supports taking several additional party and non-party depositions (most of which would be taken remotely and limited to a few hours each), and reserves the right to make a motion for leave to take these depositions, including the deposition of Felicia Razon.
2. Defendants have subpoenaed Howard Lutnick and he has objected. Defendants reserve the right to make a motion to compel his deposition.

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Finally, the parties are continuing to meet and confer on a variety of logistical issues in connection with depositions, and reserve all rights.

Respectfully submitted,

MINTZ, LEVIN, COHN, FERRIS,
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*Attorneys for Defendants Bloomberry Resorts
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SO ORDERED.



SARAH NETBURN
United States Magistrate Judge

Dated: March 1, 2022
New York, New York